

**SUPPRESSED  
FILED**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

NOV 10 2021

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL ROSSI,

Defendant.

4:21CR616 JAR/DDN

**INDICTMENT**

The Grand Jury charges that:

A. **INTRODUCTION**

1. At all times material to this Indictment, Wells Fargo Bank was a financial institution insured by the Federal Deposit Insurance Corporation. Vantage Credit Union was a financial institution insured by the National Credit Union Share Insurance Fund.

B. **SCHEME TO DEFRAUD**

2. From on or about December 28, 2020 until the present date, in the Eastern District of Missouri,

**MICHAEL ROSSI,**

the Defendant herein, knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain money, funds, credits, and other property owned by and under the custody and control of Wells Fargo Bank and Vantage Credit Union, by means of false and fraudulent pretenses, representations, and promises.

C. **MANNER AND MEANS**

3. It was part of the scheme and artifice to defraud financial institutions and to obtain money under said financial institutions' custody and control by means of false and fraudulent pretenses, representations, and promises made in order to deceive, that:

- a. KAYLA SIMMONS, aided and assisted by RYAN KANZLER, stole checks from the U.S. Mail.
- b. KAYLA SIMMONS and RYAN KANZLER would alter the stolen checks.
- c. KAYLA SIMMONS, RYAN KANZLER, GARY FORD, and MICHAEL ROSSI would negotiate and attempt to negotiate the stolen and altered checks.

D. **EXECUTION OF THE SCHEME**

**COUNT I**  
**(Bank Fraud)**

4. On or about December 28, 2020, in the Eastern District of Missouri,

**MICHAEL ROSSI,**

the Defendant herein, for the purpose of executing the aforementioned scheme, did knowingly negotiate a stolen and fraudulently altered Vantage Credit Union check in the amount of \$300.00.

In violation of, and punishable under, Title 18, United States Code, Section 1344.

**COUNT II**  
**(Bank Fraud)**

The Grand Jury further charges that:

5. The allegations of paragraphs 1 through 3 are incorporated by reference and realleged.

6. On or about May 4, 2021, in the Eastern District of Missouri,

**MICHAEL ROSSI,**

the Defendant herein, for the purpose of executing the aforementioned scheme, did knowingly attempt to negotiate a stolen and fraudulently altered Wells Fargo check in the amount of \$4,851.25.

In violation of, and punishable under, Title 18, United States Code, Section 1344.

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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JOHN J. WARE, #40880MO  
Assistant United States Attorney